

# **EXHIBIT 20**

CONFIDENTIAL

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO

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)  
ANIBAL RODRIGUEZ, et al., )  
individually and on behalf of )  
all others similarly situated, )  
)  
Plaintiffs, )  
) Case No.:  
vs. ) 3:20-CV-04688  
)  
GOOGLE LLC, et al., )  
)  
Defendant. )  
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\*\* CONFIDENTIAL \*\*

Videotaped Deposition of  
ANIBAL RODRIGUEZ  
(Conducted Remotely)  
Sunday, October 16, 2022  
12:03 p.m. EDT

Job No.: 5516994  
Reported by: BRENDA MATZOV, CSR NO. 9243

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1 use your words -- was engaging in disturbing 14:00:52  
2 conduct by collecting data while WAA is off 14:00:56  
3 factor into your decision to purchase another 14:00:56  
4 phone that used the Android software system? 14:01:00  
5 A. Because, you know, being limited to 14:01:05  
6 what I have as far as options. Again, I'm not 14:01:06  
7 a rich person. I don't -- I don't have money 14:01:09  
8 to buy certain phones. My provider had a great 14:01:11  
9 deal and I had to do that. Sometimes I -- you 14:01:16  
10 know, you have to go that route. I mean, that's 14:01:19  
11 basically what it comes down to. I mean, that's -- 14:01:23  
12 that's why I chose to do that. 14:01:25  
13 But, again, WAA's off, it should not 14:01:29  
14 be collecting data, you know. It -- it's plain 14:01:33  
15 and simple. 14:01:37  
16 And, again, we're -- we're -- we're 14:01:42  
17 in this here. And as -- as far as what we're 14:01:43  
18 investigating, I didn't want to change any of 14:01:51  
19 my -- my -- my activities or -- or what I'm doing 14:01:53  
20 if before -- if -- if we're in this investigation, 14:01:59  
21 I needed to keep what I had. 14:02:01  
22 So my phone still had same apps, still 14:02:04  
23 have WAA off, and my -- my behaviors are still 14:02:08  
24 the same. In order for this to continue, I want 14:02:11  
25 to make sure that you know that I still have 14:02:15

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1 the same behaviors. 14:02:17

2 Q. Why did you think it was important 14:02:21

3 that you have the same behaviors during your 14:02:24

4 investigation? 14:02:26

5 A. Because we're -- we're in this 14:02:27

6 investigation. And if -- if everything is -- 14:02:28

7 you know, if -- if you are indeed taking 14:02:30

8 information from me without my permission, 14:02:34

9 we need to know. So my phone is still there, 14:02:36

10 the same way it was before -- before the 14:02:40

11 allegation and while we're in this deposition. 14:02:42

12 So why I have the same phone is so 14:02:45

13 that way we can figure out what's going on. 14:02:49

14 And, obviously, at the end of the day, we'll 14:02:52

15 figure out what -- what's really happening. 14:02:54

16 Q. How will you do that? 14:02:57

17 A. Well, you're -- we're -- we're doing 14:03:00

18 an investigation. We're in this lawsuit here. 14:03:01

19 And I have lawyers and other professionals that 14:03:04

20 are looking into that. 14:03:08

21 Q. Besides what your lawyers are doing, 14:03:13

22 do you have any knowledge about what is being 14:03:14

23 done to investigate your allegations? 14:03:17

24 MR. LEE: I think she's asking about 14:03:21

25 things beyond discussions you've had with counsel. 14:03:23

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1 And, you know, as -- as far as apps -- 19:50:43

2 going back to your question with apps, what apps 19:50:46

3 are associated, I don't know offhand what they 19:50:49

4 are. 19:50:53

5 Q. So earlier you testified that you have 19:50:55

6 a hard time sleeping knowing what Google might 19:50:58

7 be doing with data when WAA is off. 19:51:01

8 [REDACTED] 19:51:05

9 [REDACTED] 19:51:09

10 [REDACTED] 19:51:15

11 [REDACTED] 19:51:16

12 [REDACTED] [REDACTED] 19:51:18

13 [REDACTED] [REDACTED] 19:51:21

14 [REDACTED] 19:51:24

15 [REDACTED] [REDACTED] 19:51:26

16 [REDACTED] [REDACTED] [REDACTED] 19:51:30

17 [REDACTED] [REDACTED] 19:51:33

18 [REDACTED] 19:51:36

19 [REDACTED] [REDACTED] 19:51:37

20 [REDACTED] 19:51:44

21 [REDACTED] [REDACTED] [REDACTED] 19:51:44

22 [REDACTED] [REDACTED] 19:51:47

23 [REDACTED] 19:51:52

24 [REDACTED] 19:51:55

25 [REDACTED] [REDACTED] 19:51:58

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1	[REDACTED]	19:52:01
2	[REDACTED]	19:52:02
3	[REDACTED].	19:52:05
4	[REDACTED]	19:52:06
5	[REDACTED]	19:52:07
6	[REDACTED]	19:52:12
7	[REDACTED]	19:52:16
8	[REDACTED]	19:52:20
9	[REDACTED],	19:52:23
10	[REDACTED].	19:52:28
11	[REDACTED]	19:52:33
12	[REDACTED]	19:52:37
13	[REDACTED]	19:52:42
14	[REDACTED]	19:52:46
15	[REDACTED]	19:52:49
16	[REDACTED]	19:52:52
17	[REDACTED]	19:52:55
18	[REDACTED]	19:53:00
19	[REDACTED]	19:53:02
20	[REDACTED]	19:53:07
21	[REDACTED]	19:53:11
22	[REDACTED]	19:53:16
23	[REDACTED]	19:53:18
24	Q. Is there a reason you didn't want to	19:53:22
25	take the harder route of creating a Yahoo account	19:53:24

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1 while you investigated your claims against Google? 19:53:25

2 A. Because I already have my account already 19:53:30

3 here. I already have my account on Google, my -- 19:53:34

4 my -- my -- my Google account on my device. And, 19:53:39

5 again, it's easier to just go to Google and press 19:53:43

6 "Add an account," create the e-mail really quick, 19:53:47

7 get your password and such, and then have it in 19:53:51

8 my dashboard to pick. But they don't have access 19:53:55

9 to those e-mails that I created on my phone. 19:54:01

10 MR. LEE: Hey, guys. 19:54:05

11 MS. ARAKAKI: I -- 19:54:05

12 MR. LEE: We're going to need to take 19:54:05

13 a break because our -- our food's here and we 19:54:07

14 gotta go downstairs to get it. So I can't leave 19:54:11

15 the guy waiting. Can we take a -- a ten-minute 19:54:11

16 short break while we can do that? And we'll 19:54:14

17 come back up. I think we can just -- we just 19:54:17

18 got munchables. So we're not going to take any 19:54:20

19 time for dinner. But I do need to grab the food 19:54:23

20 before the guy -- delivery guy leaves. 19:54:25

21 MS. ARAKAKI: Okay. I'm not going to 19:54:28

22 agree to go off the record just yet. But I am 19:54:29

23 almost done. And then we can go off the record. 19:54:30

24 MR. LEE: Actually -- 19:54:34

25 MS. ARAKAKI: I'm going to ask my next -- 19:54:34

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1 BY MS. ARAKAKI: 20:08:30

2 Q. Apart from making sure WAA is off, 20:08:31

3 did you change your behavior in the way you 20:08:33

4 interacted with any of the apps after and as 20:08:36

5 a result of the allegations in your July 2020 20:08:39

6 Complaint? 20:08:42

7 MR. LEE: Asked and answered. 20:08:44

8 THE WITNESS: No. The -- it -- it's -- 20:08:44

9 I continue on with the WAA off and same behaviors. 20:08:46

10 I mean, it's -- what I changed was the -- the -- 20:08:52

11 the WAA, making sure it's off, making sure all 20:08:55

12 my e-mails -- because I didn't know that they 20:08:58

13 were on and then make sure they're off. But 20:09:00

14 once I could -- once I did that, I continued 20:09:03

15 on. 20:09:06

16 BY MS. ARAKAKI: 20:09:10

17 Q. Based on and as a result of the 20:09:10

18 allegations you believe to be true in your 20:09:12

19 initial Complaint that was filed on July 20:09:15

20 2020, did you direct [REDACTED] to change any 20:09:17

21 of his behavior with respect to the apps 20:09:21

22 on his Samsung phone? 20:09:23

23 A. Did I direct him to do -- to -- 20:09:27

24 to change any -- anything on his phone? I 20:09:29

25 believe so. That was definitely something 20:09:36

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1 Q. -- as a result -- 20:10:50

2 A. We're -- we're talking about apps 20:10:52

3 here and all my behaviors regarding those apps 20:10:55

4 and my son's behaviors regarding those apps. 20:11:02

5 Specific ones, I -- I -- I don't -- 20:11:06

6 I -- I don't know what -- how am I going to 20:11:08

7 know which specific ones to look out for? 20:11:11

8 Q. So I'm not asking about any specific 20:11:18

9 app or any specific thing you should look out 20:11:20

10 for. 20:11:24

11 [REDACTED] 20:11:24

12 [REDACTED] 20:11:27

13 [REDACTED] 20:11:31

14 [REDACTED] 20:11:34

15 [REDACTED] 20:11:39

16 [REDACTED] 20:11:41

17 [REDACTED] 20:11:45

18 A. [REDACTED] 20:11:50

19 [REDACTED] 20:11:52

20 [REDACTED]. 20:11:54

21 Q. [REDACTED] 20:12:04

22 [REDACTED] 20:12:08

23 A. [REDACTED] [REDACTED] [REDACTED] 20:12:11

24 [REDACTED] 20:12:15

25 Q. Have you installed new apps since 20:12:21

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1	July 2020?	20:12:21
2	A. Yes.	20:12:22
3	Q. Before installing new apps after	20:12:23
4	July 2020, did you investigate whether those	20:12:26
5	apps use Google Analytics for Firebase?	20:12:29
6	A. No.	20:12:35
7	MS. ARAKAKI: Mr. Lee, did you want	20:12:50
8	to go off the record to eat the dinner that	20:12:51
9	you all had picked up?	20:12:54
10	MR. LEE: Well, I'm not eating at	20:13:00
11	this point. So --	20:13:01
12	THE WITNESS: I'm good.	20:13:03
13	MR. LEE: What's the time on the	20:13:04
14	record? Are you done? Lori, are you done?	20:13:05
15	MS. ARAKAKI: No. I have -- no. I	20:13:12
16	have a little more. But it was a good breaking	20:13:12
17	point. So --	20:13:16
18	MR. LEE: A good breaking point for	20:13:17
19	you now?	20:13:20
20	MS. ARAKAKI: -- I wanted to ask.	20:13:20
21	Yes. It was a good breaking point.	20:13:21
22	So I wanted --	20:13:23
23	MR. LEE: For who?	20:13:23
24	MS. ARAKAKI: -- to ask if you wanted	20:13:23
25	a break.	20:13:23

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CERTIFICATE OF REPORTER

I, BRENDA MATZOV, CSR NO. 9243, do hereby  
certify:

That, prior to being examined, the witness  
named in the foregoing deposition was remotely duly  
sworn by me to testify the truth, the whole truth,  
and nothing but the truth;

That the foregoing deposition was taken  
remotely before me, at which time the aforesaid  
proceedings were stenographically recorded by me  
and thereafter transcribed by me;

That the foregoing transcript, as typed,  
is a true record of the said proceedings;

And I further certify that I am not  
interested in the action.

Dated this 28th day of October, 2022.

A handwritten signature in blue ink that reads "Brenda Matzov". The signature is written in a cursive style and is positioned above a horizontal line.

BRENDA MATZOV, CSR NO. 9243